

SEALED

IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ERIC C. JACKSON,
 aka "Little E," aka "King Money,"
 FRANKLIN W. JACKSON,
 SCOTT GREENWOOD,
 ERIN RUSHFORD, and
 LAUREN ROOSA,

Defendants.

) Criminal No. **5:22-CR-425 (DNH)**
)
) **Indictment**
)
) Violations: 21 U.S.C. § 846
) [Conspiracy to Distribute and
) Possess with Intent to
) Distribute a Controlled
) Substance]
)
) 21 U.S.C. § 841(a)(1)
) [Distribution and Possession
) with Intent to Distribute a
) Controlled Substance]
)
)
) 5 Counts
)
) County of Onondaga
) Offenses:

THE GRAND JURY CHARGES:

COUNT ONE

[Conspiracy to Distribute and Possess with Intent to Distribute a Controlled Substance]

Beginning no later than in or around June 2020, through at least April 21, 2021, in Onondaga County in the Northern District of New York, and elsewhere, the defendants,

**ERIC C. JACKSON, aka "Little E" and "King Money,"
 FRANKLIN W. JACKSON,
 SCOTT GREENWOOD,
 ERIN RUSHFORD, and
 LAUREN ROOSA,**

conspired with each other and with others to knowingly and intentionally distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

As to **ERIC C. JACKSON**, aka “Little E,” aka “King Money,” **FRANKLIN W. JACKSON**, and **SCOTT GREENWOOD**, that violation involved 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, in violation of Title 21, United States Code, Section 841(b)(1)(A).

As to **ERIN RUSHFORD**, that violation involved 5 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, in violation of Title 21, United States Code, Section 841(b)(1)(B).

As to **LAUREN ROOSA**, that violation involved methamphetamine, its salts, isomers, and salts of its isomers, in violation of Title 21, United States Code, Section 841(b)(1)(C).

COUNT TWO

[Attempted Possession with Intent to Distribute a Controlled Substance]

On or about October 3, 2020, in Onondaga County in the Northern District of New York, the defendant,

SCOTT GREENWOOD,

knowingly and intentionally attempted to possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846. That violation involved 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, in violation of Title 21, United States Code, Section 841(b)(1)(A).

COUNT THREE

[Distribution and Possession with Intent to Distribute a Controlled Substance]

On or about October 8, 2020, in Onondaga County in the Northern District of New York, the defendant,

ERIN RUSHFORD,

knowingly and intentionally distributed and possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). That violation involved 5 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, in violation of Title 21, United States Code, Section 841(b)(1)(B).

COUNT FOUR

[Distribution and Possession with Intent to Distribute a Controlled Substance]

On or about October 21, 2020, in Onondaga County in the Northern District of New York,
the defendant,

SCOTT GREENWOOD,

knowingly and intentionally distributed and possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). That violation involved 5 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, in violation of Title 21, United States Code, Section 841(b)(1)(B).

COUNT FIVE

[Distribution and Possession with Intent to Distribute a Controlled Substance]

On or about January 12, 2021, in Onondaga County in the Northern District of New York,
the defendant,

ERIN RUSHFORD,

knowingly and intentionally distributed and possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). That violation involved 5 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, in violation of Title 21, United States Code, Section 841(b)(1)(B).

FORFEITURE ALLEGATION

The allegations contained in Counts One of this indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853(a).

Pursuant to Title 21, United States Code, Section 853(a), upon conviction of an offense in violation of Title 21, United States Code, Section 841, the defendants, **ERIC C. JACKSON, aka “Little E” and “King Money,” FRANKLIN W. JACKSON, SCOTT GREENWOOD, ERIN RUSHFORD, and LAUREN ROOSA**, shall forfeit to the United States of America any property constituting, and derived from, any proceeds obtained, directly and indirectly, as the result of such offenses and any property used, and intended to be used, in any manner and part, to commit, and to facilitate the commission of the offenses.

The property to be forfeited includes, but is not limited to, the following:

Currency

1. any interest **LAUREN ROOSA** may have in \$17,460 in U.S. currency seized on or about April 21, 2021; and
2. any interest **LAUREN ROOSA** may have in \$4,550 in U.S. currency seized on or about April 23, 2021.

Money Judgments

3. a money judgment in an amount to be determined representing the missing proceeds of the offense obtained by **ERIC C. JACKSON, aka “Little E” and “King Money;”**

4. a money judgment in an amount to be determined representing the missing proceeds of the offense obtained by **FRANKLIN W. JACKSON**;
5. a money judgment in an amount to be determined representing the missing proceeds of the offense obtained by **SCOTT GREENWOOD**;
6. a money judgment in an amount to be determined representing the missing proceeds of the offense obtained by **ERIN RUSHFORD**; and
7. a money judgment in an amount to be determined representing the missing proceeds of the offense obtained by **LAUREN ROOSA**.

Substitute Assets

If the property described in the Forfeiture Allegation set forth above as being subject to forfeiture, as the result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to

seek forfeiture of any other property of the defendant up to the value of the forfeiture money judgment.

Dated: November 16, 2022

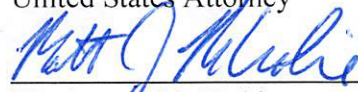
**NAME REDACTED

A TRUE BILL,

Grand Jury Foreperson

CARLA B. FREEDMAN
United States Attorney

By:


Matthew J. McCrobie
Assistant United States Attorney
Bar Roll No. 702739